

FILED

NOV 17 2023

PETER A. MOORE, JR., CLERK
US DISTRICT COURT, EDNC
BY SC DEP CLK

UNITED STATES DISTRICT COURT

for the

Eastern District of North Carolina

United States of America

v.

Shawn Tobin Locklear, Jr.

Case No. 7:23-mj-1286-RJ

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 7, 2023 in the county of Robeson in the
Eastern District of North Carolina, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18 U.S.C. 2119(2)	Carjacking resulting in serious bodily injury

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

On this day, Stanley Jackson
appeared before me via reliable electronic
means, was placed under oath, and attested
to the contents of this Affidavit in accordance
with Fed. R. Crim. P. 4.1.

Stanley Jackson
Complainant's signature

Stanley Jackson, Task Force Officer

Printed name and title

Attested to by the complainant in accordance with the requirements of Fed. R. Crim. P. 4.1

by Stanley Jackson (specify reliable electronic means).

Date: November 17 2023

City and state: Wilmington, North Carolina

Robert B. Jones, Jr.
Judge's signature

Robert B. Jones, Jr., U.S. Magistrate Judge

Printed name and title

RJD

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA**

Probable Cause Affidavit

I, Stanley Jackson, hereinafter designated as Affiant, having been duly sworn according to law, deposes and states that:

1. Affiant is a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF, United States Justice Department). Affiant has been assigned to this position since August 2023 and is currently assigned to the Fayetteville, North Carolina Field Office. Affiant's duties include, but are not limited to, enforcing Federal firearms laws and other violent crimes. Affiant has also been employed by the Robeson County Sheriff's Office since April 2006 as a Deputy Sheriff and is currently assigned to the Major Crimes Division. During affiant's employment with the Robeson County Sheriff's Office, affiant has conducted and assisted in numerous felony investigations that were prosecuted in Federal and State court. As a result of affiant's training and experience as an ATF Task Force Officer, affiant is familiar with Federal criminal laws and knows that it is a violation of 18 U.S.C. Section 2119(2) to commit a carjacking resulting in serious bodily injury.
2. This affidavit is submitted for the limited purpose of establishing probable cause that Shawn Tobin LOCKLEAR, Jr. (hereinafter "LOCKLEAR"), knowingly carjacked a vehicle resulting in serious bodily injury, in violation of Title 18, United States Code, Section 2119(2).
3. There is probable cause to believe that LOCKLEAR, with the intent to cause death and serious bodily harm, took a motor vehicle, that is, a 2022 Ford Explorer bearing VIN number: "1FM5K8ABXNGC36325", that had been transported, shipped, and received in

interstate and foreign commerce, from the person and the presence of another, by force and violence, and by intimidation, and that serious bodily injury resulted, in violation of Title 18, United States Code, Section 2119(2).

4. I am familiar with the facts and circumstances of this investigation. The information contained in this affidavit is the product of a Robeson County Sheriff's Office investigation and investigation by other Law Enforcement Agencies.
5. Information contained within this affidavit is based upon information from this Affiant's investigation, personal observations, training and experience, and information provided to this Affiant by other law enforcement officers.
6. On November 7, 2023, at approximately 9:26 A.M., Deputy ~~K~~ Locklear ~~X~~, Deputy J. Walters and Corporal Sampson of the Robeson County Sheriff's Office were in the area of 209 Lois Ann Road, Maxton, North Carolina, in an attempt to serve arrest warrants on LOCKLEAR. While in the area, Cpl. Sampson advised over the radio that he was in a foot chase with LOCKLEAR. Deputy Locklear and Deputy Walters responded to the location of 1206 Old Red Springs Road, Maxton to assist Cpl. Sampson and locate LOCKLEAR. Upon arrival Deputy Locklear and Deputy Walters located LOCKLEAR hiding behind a tree. As Deputy Locklear and Deputy Walters exited their patrol vehicles, they began to give commands to LOCKLEAR to show his hands. LOCKLEAR then stuck one of his hands out from behind the tree but hid the other. LOCKLEAR then leaned from behind the tree and began shooting at the deputies with a firearm. Both Deputies Locklear and Walters were struck by gunfire and fell to the ground. Deputy Walters took cover behind the back of Deputy Locklear's patrol vehicle. Deputy Locklear also took cover behind the patrol


Notwithstanding their last names, there is no relation between Deputy S. Locklear and Shawn Tobin Locklear, Jr.

On this day, Stanley Locklear
appeared before me via reliable electronic
means, was placed under oath, and attested
to the contents of this Affidavit in accordance
with Fed. R. Crim. P. 4.1.

vehicle but was able to stand up as he reloaded his weapon. As the Deputies took cover, LOCKLEAR ran to the front of Deputy Locklear's patrol vehicle and got into the driver seat.

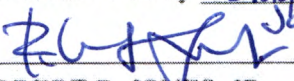
7. LOCKLEAR then put the car into reverse as Deputy Walters was still located on the ground behind and under the patrol vehicle. Deputy Walters was able to push himself partially out of the way before LOCKLEAR drove in reverse and ran over Deputy Walters's leg with the car. LOCKLEAR continued reversing and collided with Deputy Walters's patrol vehicle as he made it back onto the road. As this occurred, Deputy Locklear fired several rounds into the patrol vehicle windshield striking LOCKLEAR.
8. LOCKLEAR was able to drive away with the patrol vehicle and fled the scene. Cpl. Sampson arrived on scene, and he and other bystanders rendered aid to both Deputy Locklear and Deputy Walters. Both deputies sustained gunshot wounds. Deputy Walters sustained gunshot wounds to his lower extremities, while Deputy Locklear sustained multiple gunshot wounds to his upper body.
9. Deputies Locklear and Walters were both equipped with body worn cameras issued by the Robeson County Sheriff's Office, which recorded the entire incident. I have reviewed those body cameras which captured the events as described above.
10. On November 9, 2023, ATF TFO Little researched and reviewed documentation of the origin and manufacturing facilities of Ford Explorer vehicles. The Ford Explorer was manufactured in Chicago, Illinois; therefore, it traveled in and affected interstate commerce before being possessed in the state of North Carolina.
11. Based on the foregoing investigation, this Affiant has probable cause to believe that the suspect, Shawn Tobin LOCKLEAR Jr., did commit violations of federal law, including 18

U.S.C. § 2119(2) (carjacking resulting in serious bodily injury). I respectfully request that
a criminal complaint warrant be issued for Shawn Tobin LOCKLEAR Jr.



Stanley Jackson
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms and Explosives

Attested to by the complainant in accordance with requirements of Fed.
R. Crim. P. 4.1 by Stanley Jackson this 17 day of November 2023.



ROBERT B. JONES, JR.
United States Magistrate Judge